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HYNIX SEMICONDUCTOR INC.,
HYNIX SEMICONDUCTOR AMERICA INC.,
HYNIX SEMICONDUCTOR U.K. LTD., and
HYNIX SEMICONDUCTOR DEUTSCHLAND
GmbH

E-FILED - 11/19/08

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ATTORNEYS FOR RAMBUS INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.,
HYNIX SEMICONDUCTOR AMERICA
INC., HYNIX SEMICONDUCTOR U.K.
LTD., and HYNIX SEMICONDUCTOR
DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO.: CV 00-20905 RMW

**SUPPLEMENTAL STIPULATED
~~PROPOSED~~ ORDER DESIGNATING
CERTAIN RAMBUS DOCUMENTS
"CONFIDENTIAL - OUTSIDE COUNSEL
ONLY"**

1
2 WHEREAS Rambus Inc. ("Rambus") and Hynix Semiconductor Inc., Hynix
3 Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd, and Hynix Semiconductor
4 Deutschland GmbH (collectively "Hynix") executed a Stipulated Motion and [Proposed] Order
5 Designating Certain Rambus Documents "Confidential–Outside Counsel Only" that was filed
6 with the Court on May 14, 2008 (the "Proposed Order");

7 WHEREAS Attachment A to the Proposed Order listed the bates numbers of the
8 documents Rambus produced to Hynix on May 12, 2008;

9 WHEREAS three additional documents bearing bates numbers R8067664-7707,
10 R8089722-9724, R8091605-1638 (the "Licensing Documents") were produced to Hynix and
11 were omitted from Attachment A to the Proposed Order;

12 WHEREAS Elpida Memory, Inc. and/or Elpida Memory (USA) Inc. (collectively
13 "Elpida") indicated that such documents are highly confidential and commercially sensitive and
14 therefore asked that such documents be accorded the highest level of confidentiality available
15 under the June 20, 2001 Protective Order (the "Protective Order");

16 WHEREAS Rambus and Hynix agree that such documents should be designated
17 and treated as "CONFIDENTIAL–OUTSIDE COUNSEL ONLY";

18 WHEREAS the Protective Order requires a court order to designate a document as
19 "CONFIDENTIAL–OUTSIDE COUNSEL ONLY";

20 WHEREFORE, Rambus and Hynix stipulate and agree as follows:

21 1. The Licensing Documents shall be designated as "CONFIDENTIAL–
22 OUTSIDE COUNSEL ONLY" and treated accordingly under the Protective Order, except as
23 modified below or by agreement of the parties and Elpida.

24 2. The Licensing Documents may be disclosed, given, shown, made available
25 or otherwise communicated in any way to only the individuals identified in Paragraph 20 of the
26 Protective Order, except that (i) under paragraph 20(a), the Licensing Documents can only be
27 shown to outside attorneys retained by the parties in this action to consult on the litigation, (ii) the
28 Licensing Documents may not be shared with the individuals identified in paragraph 20(b), and

(iii) Rambus may use such documents to conduct its ordinary business.

3. The Licensing Documents may only be used for purposes of the above-captioned litigation, except that Rambus may use such documents to conduct its ordinary business.

4. To avoid the necessity of a motion, Hynix and Rambus hereby request that this stipulation and order be approved by the Court.

DATED: October 31, 2008

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SEAN ESKOVITZ
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By: Carolyn Luedtke
CAROLYN H. LUEDTKE

Attorneys for RAMBUS INC.

DATED: October ____, 2008

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1 (iii) Rambus may use such documents to conduct its ordinary business.

2 3. The Licensing Documents may only be used for purposes of the above-
3 captioned litigation, except that Rambus may use such documents to conduct its ordinary business.

4 4. To avoid the necessity of a motion, Hynix and Rambus hereby request that
5 this stipulation and order be approved by the Court.

6 DATED: October ____, 2008

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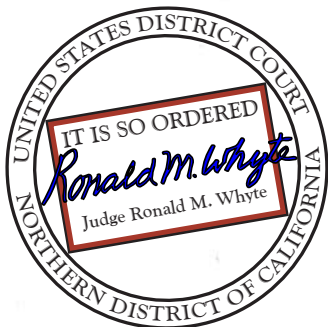
13 Attorneys for RAMBUS INC.

14 DATED: October 28, 2008

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